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8 *Attorneys for Plaintiffs Bank of America, N.A.*  
9 *and Federal National Mortgage Association*

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 BANK OF AMERICA, N.A., successor by  
merger to BAC HOME LOANS SERVICING,  
LP fka COUNTRYWIDE HOME LOANS  
SERVICING, LP and FEDERAL NATIONAL  
MORTGAGE ASSOCIATION,

13 Plaintiffs,

14 vs.

15 SANTA BARBARA HOMEOWNERS  
ASSOCIATION; SFR INVESTMENTS  
POOL 1, LLC; and ABSOLUTE  
COLLECTION SERVICES, LLC,

16 Defendants.

17 Case No.: 2:16-cv-02768-MMD-CWH

18 **STIPULATION AND ORDER TO EXTEND  
BANK OF AMERICA, N.A.'S DEADLINE TO  
REPLY IN SUPPORT OF ITS MOTION FOR  
PROTECTION  
[ECF NO. 90]**

19 (First Request)

20 Plaintiff and counter-defendants Bank of America, N.A. (**BANA**) and defendant SFR  
21 Investments Pool 1, LLC hereby agree as follows:

22 1. On August 31, 2018, Federal National Mortgage Association (**Fannie Mae**) filed  
23 a motion to stay discovery or in the alternative emergency motion to quash the notice of deposition  
24 and/or for a protective order to limit defendant's 30(b)(6) deposition topics. ECF Nos. 87-88.  
25 BANA joined Fannie Mae's motion to stay discovery (ECF No. 89) and in the alternative moved  
26 for emergency protection limiting the deposition topics in its 30(b)(6) deposition (ECF Nos. 90).  
27

1           2. On September 24, 2018, Fannie, BANA, and SFR stipulated to extend SFR's  
2 deadline to respond to ECF Nos. 87-90 until Monday, September 24, 2018 at noon. ECF No. 95.

3           3. On September 24, 2018, Fannie, BANA, and SFR stipulated to extend SFR's  
4 deadline to respond to ECF Nos. 87-90 until Monday, September 25, 2018 at noon. ECF No. 96.

5           4. On September 25, 2018, SFR filed its response to Fannie Mae's motion to stay  
6 discovery or in the alternative emergency motion to quash the notice of deposition and/or for a  
7 protective order to limit defendant's 30(b)(6) deposition topics, Bank of America, N.A.'s joinder  
8 to motion to stay AND countermotion to stay litigation. ECF Nos. 97, 98, 100 and 101.

9           5. Duplicate copies of the same document addressing multiple issued were filed a  
10 total of five times. SFR responded to Fannie Mae's motion to stay (ECF No. 87) with ECF No.  
11 97, Fannie Mae's motion to quash (ECF No. 88) with ECF No. 98, BANA's joinder to the motion  
12 to stay (ECF No. 89) with ECF No. 100, and SFR's counter motion to stay litigation (ECF No.  
13 101). The same document was also inadvertently filed as ECF No. 99 and linked to ECF No. 90,  
14 BANA's motion for protective order. This was not correct as the document filed as ECF No. 99  
15 did not address the points and authorities of BANA's motion for protective order (ECF No. 90).

16           6. On September 25, 2018, SFR also filed a different document with different points  
17 and authorities in response to ECF No. 90, BANA's motion for protective order as ECF No. 102.  
18 At the time of drafting the reply in support of BANA's motion for protective order, BANA's  
19 counsel did not realize the response had been filed as ECF No. 102 due to the other document  
being improperly linked to ECF No. 90.

20           7. On October 2, 2018, Fannie Mae filed its reply in support of its motion to stay  
21 discovery and motion for protective order (ECF No. 105) and opposed SFR's counter motion to  
22 stay litigation (ECF No. 106). Also on October 2, 2018, BANA joined Fannie Mae's reply in  
23 support of the motion to stay discovery (ECF No 107), joined Fannie Mae's opposition to the  
24 counter motion to stay litigation (ECF No. 108), and replied in support of its motion for protective  
25 order (ECF No. 109).

26           8. BANA's reply in support of its motion for protective order states SFR did not  
27 respond to the motion for protective order. *See* ECF Nos. 107-109, at 2:6-15. Given the confusion

caused by the duplicate filings, the parties stipulate to strike this portion of BANA's joinders and  
reply in support from ECF Nos. 107-109.

3           9.       Counsel for BANA needs additional time to reply to the arguments raised in SFR's  
4 opposition to BANA's motion for protective order filed as ECF No. 102. The additional time  
5 will allow BANA to properly address the issues raised. The parties agree BANA's deadline to  
6 reply in support of its motion for protective order shall be extended until October 10, 2018.

10. This stipulation is made in good faith and not for the purpose of delay.

DATED October 8, 2018

AKERMAN LLP

/s/ Darren Brenner

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## ORDER

IT IS SO ORDERED.

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**UNITED STATES DISTRICT JUDGE**

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DATED: 10/10/2018